UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

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Proposed Local Counsel to the Official Committee of Talc Claimants II

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In re:

LTL MANAGEMENT LLC,

Debtor.

Chapter 11

Case No.: 21-30589 (MBK)

Honorable Michael B. Kaplan

SUPPLEMENTAL CERTIFICATION OF PROFESSIONAL IN SUPPORT OF APPLICATION FOR RETENTION OF PROFESSIONAL

Arthur J. Abramowitz, of full age, certifies as follows:

- 1. I am a shareholder with the law firm Sherman, Silverstein, Kohl, Rose & Podolsky, P.A. ("Sherman Silverstein"), proposed local counsel to the Official Committee of Tort Claimants II (the "Committee") in the chapter 11 proceedings of LTL Management, LLC. I respectfully submit this certification in further support of the Application for Retention of Professional Sherman Silverstein as Local Counsel to the Committee (the "Application"). Docket No. 1079.
- 2. The Committee intends to seek authorization to retain the following firms as its counsel: (i) Cooley LLP; (ii) Bailey Glasser LLP; (iii) Waldrep Wall Babcock & Bailey PLLC; (iv) Massey & Gail LLP; and (v) Sherman Silverstein.
- 3. Each of the firms the Committee has proposed to retain serves a distinct purpose from the others:
 - (a) Cooley LLP serves as lead bankruptcy counsel, providing a deep bench of attorneys with core bankruptcy, bankruptcy litigation and mass tort bankruptcy experience;
 - (b) Bailey & Glasser LLP serves as lead mass tort/litigation counsel, providing particular expertise in trial preparation, especially with respect to causes of action sounding in fraud;
 - (c) Waldrep Wall Babcock & Bailey PLLC serves as special bankruptcy counsel, providing the unique perspective of a former bankruptcy judge and experience and expertise in connection with this Case and this Case's predecessor cases in the Western District of North Carolina;

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Massey & Gail serves as special counsel, providing unparalleled mass tort and other (d) complex case experience before trial and appellate courts, including the Supreme Court;

and

Sherman, Silverstein, Kohl, Rose & Podolsky, P.A. serves as local counsel, with (e)

extensive experience and expertise in bankruptcy cases in the District of New Jersey.

4. As part of the allocation of responsibilities of its proposed counsel, a multi-step

system has been developed and implemented to determine the distribution of work relating to the

bankruptcy case and related proceedings in an effort to avoid duplication of services. First, a small

group of senior partners confers to determine the strategy in consultation with the Committee

members and their designated representatives. Next, one firm is assigned primary responsibility

for a task. Once a task has been preliminarily completed, it is reviewed by the other firms, allowing

the firm to which the task was assigned to benefit from the extensive knowledge and varying

perspectives of co-counsel. Once co-counsel has signed off on a particular task, it is circulated to

the Committee members and their representatives for review and comment.

I hereby certify that the foregoing statements made by me are true. I am aware that if any

of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: January 18, 2022

By: /s/ Arthur J. Abramowitz
ARTHUR J. ABRAMOWITZ